

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

v.

No. 20-CR-00006-PB

CHRISTOPHER CANTWELL

ASSENTED TO MOTION TO CONTINUE TRIAL

Christopher Cantwell respectfully moves the Court to continue the jury trial in this case, currently scheduled for jury selection on August 18, 2020, for approximately 30 days, until the second jury term in September 2020.¹ As grounds for this motion, it is stated:

Defense counsel today reviewed approximately 2600 pages of additional discovery that was just made available, in the U.S. Attorney's Office. The parties are working toward entering into an amended protective agreement that would permit transfer of that material to the defense for use in trial preparation. Additional time is needed to finalize the agreement, receive and review the new discovery, and prepare for trial.

In these circumstances, the ends of justice served by granting a continuance outweigh the best interest of the public and the defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A) & (B)(iv). For these reasons, counsel respectfully requests

¹ No memorandum accompanies this motion because one is not necessary as the government has assented to the motion.

a 30-day continuance of the trial date, until the second jury term in September 2020. A signed, written waiver of speedy trial rights will be submitted separately.

Government's counsel (John Davis, AUSA) has been contacted and has no objection to this motion.

Wherefore, the defendant respectfully moves this Court to grant this motion, continue the trial until the second term in September 2020, and such other relief as may be deemed just and equitable.

Respectfully submitted,

/s/ Eric Wolpin

Eric Wolpin

N.H. Bar #18372

Assistant Federal Public Defender

Eric_Wolpin @fd.org

/s/ Jeffrey Levin

Jeffrey Levin

N.H. Bar # 12901

Assistant Federal Public Defender

Jeff_Levin@fd.org

CERTIFICATE OF SERVICE

I hereby certify that on July 23, 2020 the above document was served electronically upon all counsel of record through the CM/ECF filing system.

/s/ Eric Wolpin

Eric Wolpin

/s/ Jeffrey Levin

Jeffrey Levin